

# EXHIBIT C

# EXHIBIT C

1 **LIEN**

2 Sean K. Claggett, Esq.  
 3 Nevada Bar No. 008407  
 4 Jennifer Morales, Esq.  
 5 Nevada Bar No. 008829  
 6 CLAGGETT & SYKES LAW FIRM  
 7 4101 Meadows Lane, Suite 100  
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13 **DISTRICT COURT**  
 14 **CLARK COUNTY, NEVADA**

15 LOGAN ERNE, an Individual,

16 Plaintiff,

17 CASE NO.: A-18-773499-C

18 v.

19 DEPT NO.: III

20 MARGARET WILLIAMS, LPCC an Individual;  
 21 MARILYN S. ABEL, CPC, an Individual;  
 22 ANTHONY QUINN, M.D., an Individual,  
 23 BRANDON PAYZANT, PAC, PHC OF  
 24 NEVADA, INC. DBA HARMONY  
 25 HEALTHCARE, a foreign corporation; and  
 26 SUMMERLIN HOSPITAL & MEDICAL  
 27 CENTER LLC, a limited liability company.;  
 28 DOES I through X; ROE BUSINESS ENTITIES  
 XI through XX, inclusive,

29 Defendants.

**NOTICE OF ATTORNEY'S LIEN**

30 NOTICE IS HEREBY GIVEN that CLAGGETT & SYKES LAW FIRM claims a lien for  
 31 its services upon the claims for relief on behalf of LOGAN ERNE, and any successor and/or  
 32 predecessor plaintiff in the above-referenced litigation, against any person, entity or insurance  
 33 company legally liable for damages as a result of the incident occurring on April 26, 2017, that is  
 34 now the subject of this lawsuit.

35 Claggett & Sykes Law Firm claims a lien and upon any and all property or gross amounts  
 36 recovered (the recovery) that may become available on behalf of LOGAN ERNE and any  
 37 successor and/or predecessor plaintiff in the above-referenced litigation:

<b>Jennifer Morales, Esq.</b>	<b>97.20 hours/\$72,900.00</b>
<b>Shannon L. Wise, Esq.</b>	<b>69.70 hours/\$27,880.00</b>
<b>Samuel Harding, Esq.</b>	<b>23.05 hours/\$17,287.50</b>
<b>Moises Garcia</b>	<b>32.50 hours/\$4,875.00</b>
<b>Jocelyn Abrego</b>	<b>48.70 hours/\$7,305.00</b>
<b>Total:</b>	<b>271.15 hours/\$130,247.50</b>

Claggett & Sykes Law Firm asserts a lien for attorney fees in the amount of **\$130,247.50**.

Claggett & Sykes Law Firm also asserts a lien against LOGAN ERNE for all reasonable case costs advanced and incurred on behalf of the plaintiff in the amount of **\$158,264.56**

Accordingly, Claggett & Sykes Law Firm asserts a total lien in this matter of **\$288,512.06** for attorney fees and costs.

DATED this 16<sup>th</sup> day of February 2021.

## CLAGGETT & SYKES LAW FIRM

*/s/ Sean K. Claggett*

Sean K. Claggett, Esq.  
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1  
**CERTIFICATE OF SERVICE**

2  
 I HEREBY CERTIFY THAT on the 16<sup>th</sup> day of February 2021, I caused to be served a true  
 3 and correct copy of the **NOTICE OF ATTORNEY'S LIEN** in the above-captioned case via the  
 4 following methods pursuant to Rule 9 of the N.E.F.C.R. and N.R.C.P. 5:

5

<p>6    Robert C. McBride, Esq.    Gerald Tan, Esq.    7 CARROLL KELLY TROTTER FRANZEN    MCBRIDE &amp; PEABODY    8 8329 W. Sunset Road, Suite 260    Las Vegas, NV 89113    9 <i>Attorneys for Defendant Anthony Quinn, M.D.</i></p>	<p>Travis E. Shetler, Esq.    10 LAW OFFICES OF TRAVIS E. SHETLER    3202 W. Charleston Blvd    Las Vegas, NV 8902    11 <i>Attorneys for Plaintiff</i></p>
<p>10 S. Brent Vogel, Esq.    11 LEWIS BRISBOIS BISGAARD &amp; SMITH,    LLP    12 6385 S. Rainbow Blvd., Suite 600    Las Vegas, NV 89118    13 <i>Attorneys for Defendants Margaret Williams,    LCPC, Marilyn S. Abel, CPC, Brandon    Payzant, PAC and PHC of Nevada, Inc., dba    Harmony Healthcare.</i></p>	<p>14 Brian F. Davis, Esq.    15 DAVIS LAW GROUP, PA    135 Cherry Street, N    Asheville, NC 28801    16 <i>Attorneys for Plaintiff</i></p>
<p>17 Michael J. Shannon, Esq.    18 Brittany A. Lewis, Esq.    19 HALL PRANGLE &amp; SCHOONVELD, LLC.    1140 North Town Center Drive, Ste. 350    Las Vegas, Nevada 89144    20 <i>Attorneys for Defendant, Summerlin Hospital    Medical Center, LLC</i></p>	<p>21 <b>VIA Regular and Certified Mail</b>    22 Logan Erne    51 Wilmington Street,    Asheville, North Carolina 28806    Plaintiff</p>
<p>23 Candance C. Herling, Esq.    24 MESSNER REEVES, LLP    25 8945 W. Russell Road #300    Las Vegas, NV 89148    26 <i>Attorneys for Defendant, Summerlin Hospital    Medical Center, LLC</i></p>	

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